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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley  
12 ABS Capital I Inc. Trust 2006-HE7, Mortgage Pass-Through Certificates, Series 2006-HE7*

13 **UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST  
16 COMPANY, AS TRUSTEE FOR MORGAN  
17 STANLEY ABS CAPITAL I INC. TRUST  
18 2006-HE7, MORTGAGE PASS-THROUGH  
19 CERTIFICATES, SERIES 2006-HE7,

20 Plaintiff,

21 vs.

22 CHICAGO TITLE INSURANCE  
23 COMPANY, AS SUCCESSOR-IN-  
24 INTEREST TO TICOR TITLE INSURANCE  
25 COMPANY; FIDELITY NATIONAL TITLE  
26 GROUP, INC.; TICOR TITLE INSURANCE  
27 COMPANY OF NEVADA; DOE  
28 INDIVIDUALS I through X; and ROE  
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:21-cv-01854-CDS-DJA

**STIPULATION AND ORDER TO STAY  
CASE PENDING RULING ON  
REMAND AND DISPOSITIVE  
MOTIONS [ECF Nos. 7, 34, & 35]**

23 Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS  
24 Capital I Inc. Trust 2006-HE7, Mortgage Pass-Through Certificates, Series 2006-HE7 (“Deutsche  
25 Bank”) and Defendants Chicago Title Insurance Company, as successor-in-interest to Ticor Title  
26 Insurance Company (“Chicago”); Fidelity National Title Group, Inc. (“Fidelity”); and Ticor Title  
27 Company of Nevada, Inc. (“Ticor”) (collectively the “Defendants”, and with Deutsche Bank, the  
28 “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1       **WHEREAS**, on October 6, 2021, Deutsche Bank filed its Complaint in Eighth Judicial  
2 District Court, Case No. A-21-842273-C [ECF No. 1-1];

3       **WHEREAS**, on October 6, 2021, Chicago filed a Petition for Removal to this Court [ECF  
4 No. 1];

5       **WHEREAS**, on November 5, 2021, Deutsche Bank filed its Motion for Remand [ECF  
6 No. 7];

7       **WHEREAS**, Deutsche Bank's Motion for Remand has been fully briefed and is pending  
8 the Court's decision [*See* ECF Nos. 8, 13];

9       **WHEREAS**, on January 3, 2022, the Court entered its Scheduling Order [ECF No. 17];

10      **WHEREAS**, on March 9, 2022, Chicago and Ticor each filed Motions to Dismiss [ECF  
11 Nos. 34, 35];

12      **WHEREAS**, Deutsche Bank's deadline to respond to the respective motions is currently  
13 May 23, 2022.

14      **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby  
15 stipulate and agree as follows:

- 16       1. In the interests of judicial economy, the Parties stipulate and agree that discovery in  
17       this case shall be **STAYED** pending the Court's decision on the pending motions [ECF  
18       Nos. 7, 34 & 35];
- 19       2. The Court's Scheduling Order [ECF No. 17] is hereby **VACATED**;
- 20       3. Nothing contained in this stipulation will affect any pending dispositive motions or  
21       prevent the Parties from filing any dispositive motions.
- 22       4. Each of the Parties may request a further Fed R. Civ. P. 26(f) conference at any time  
23       180 days after the order granting this Stipulation.
- 24       5. By entering into this Stipulation, none of the Parties is waiving its right to  
25       subsequently move the Court for an order lifting the stay in this action.

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27      ///

28      ///

1           6. In the event the motions are denied, the Parties will submit a proposed discovery plan  
2           within thirty (30) days of the Court's Order.

3           **IT IS SO STIPULATED.**

4           DATED this 16<sup>th</sup> day of May, 2022.

5           WRIGHT, FINLAY & ZAK, LLP

6           /s/ Lindsay D. Dragon

7           Lindsey Dragon, Esq.  
8           Nevada Bar No. 12448  
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10           Las Vegas, NV 89117  
11           Attorneys for Plaintiff, Deutsche Bank  
12           National Trust Company, as Trustee for  
13           Morgan Stanley ABS Capital I Inc. Trust  
14           2006-HE7, Mortgage Pass-Through  
15           Certificates, Series 2006-HE7

16           DATED this 16<sup>th</sup> day of May, 2022.

17           SINCLAIR BRAUN LLP

18           /s/ Kevin S. Sinclair

19           Kevin S. Sinclair, Esq.  
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23           Attorney for Defendants, Chicago Title  
24           Insurance Company, as successor-in-  
25           interest to Ticor Title Insurance Company;  
26           Fidelity National Title Group, Inc.; and  
27           Ticor Title Insurance Company of Nevada

28           **IT IS SO ORDERED.**

1           Dated this 1st day of June, 2022.

2             
3           UNITED STATES DISTRICT JUDGE